

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA)
) Criminal No. 20-074-MSM
)
)
DAVID STAVELEY,)
)
)
Defendant.)

**GOVERNMENT'S RESPONSE TO DEFENDANT'S
MOTION FOR RETURN OF PROPERTY**

Defendant David Staveley (“Staveley”) moved this Court (ECF #100) to compel the Government to return to him his Massachusetts driver’s license. In that motion, defendant claims that the FBI came into possession of the driver’s license when defendant left it in his vehicle when he staged his suicide. In response to this motion, the undersigned contacted the FBI, which confirmed that they do not have and never did have defendant’s driver’s license in their possession. However, the FBI reached out to the Massachusetts State Police, the law enforcement agency that responded to defendant’s abandoned vehicle. The Massachusetts State Police confirmed that they do have defendant’s driver’s license in their possession. They assert that they attempted to return the license to defendant’s mother on multiple occasions but that she did not accept it. The FBI will now take possession of the driver’s license and attempt to return it to defendant’s mother, who previously took possession of some of defendant’s other personal belongings.

For the foregoing reasons, defendant’s motion should be denied as moot.

Respectfully submitted,

ZACHARY A. CUNHA
UNITED STATES ATTORNEY

/s/ Lee H. Vilker
LEE H. VILKER
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of October 2022, I caused the within Government's Response to be filed electronically and it is available for viewing and downloading from the ECF system. I also certify that this Response has been mailed to:

David Staveley
Reg. No. 04230-049
FMC Devens – Camp
P.O. Box 879
Ayer, MA 01432

/s/ Lee H. Vilker _____
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